

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-1(b)	
K&L Gates LLP Daniel M. Eliades, Esq. David S. Catuogno, Esq. One Newark Center, 10 th Floor Newark, New Jersey 07102 (973) 848-4000 Daniel.Eliades@klgates.com David.Catuogno@klgates.com <i>Counsel for Valley National Bank</i>	
In Re:	Case No.: 22-11369 SLM
SUSSEX RANDOLPH BUILDING, L.P.,	Chapter: 11
Debtor.	Judge: Hon. Stacey L. Meisel
	Hearing: May 10, 2022 at 11:00 a.m.

**NOTICE OF MOTION OF VALLEY NATIONAL BANK FOR AN
ORDER (I) DIRECTING THE APPOINTMENT OF A CHAPTER 11 TRUSTEE
OR, IN THE ALTERNATIVE, (II) CONVERTING THE CASE
TO A PROCEEDING UNDER CHAPTER 7**

PLEASE TAKE NOTICE that on May 10, 2022 at 11:00 a.m., or as soon thereafter as counsel may be heard, the undersigned counsel to Valley National Bank (“VNB”) as creditor to Sussex Randolph Building, L.P. (the “Debtor”), by and through its undersigned counsel, will move before the Honorable Stacey L. Meisel, U.S.B.J. at the United States Bankruptcy Court, Martin Luther King, Jr., Federal Building, 50 Walnut Street, Third Floor, Newark, New Jersey, for an order (i) directing the appointment of a chapter 11 trustee or, in the alternative, (ii) converting the case to a proceeding under chapter 7 (the “Motion”).

PLEASE TAKE FURTHER NOTICE that in support of the within Motion, VNB shall rely upon the Certification of David S. Catuogno and the Memorandum of Law in Support of the Motion.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall: (i) be in writing; (ii) state with particularity the basis of the objection; and (iii) be filed with the Clerk of the United States Bankruptcy Court in accordance with D.N.J. LBR 9013-1.

PLEASE TAKE FURTHER NOTICE that unless an objection is timely filed and served, the Motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-1(a) and the relief may be granted without a hearing.

PLEASE TAKE FURTHER NOTICE that oral argument is hereby waived unless a timely objection is received.

PLEASE TAKE FURTHER NOTICE that an order granting the relief requested herein is submitted herewith and made part of the Motion herein.

Dated: April 18, 2022

K&L GATES LLP

By: /s/ David S. Catuogno

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